MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Medtec Ambulance Corporation
64697 U.S. 33
Goshen, Indiana 45622

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-2, 40 CFR 52.21, and 40 CFR 52.124 (Prevention of Significant Deterioration), with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-3 (Emission Offset), with conditions listed on the attached pages

Operation Permit No.: MSOP 039-13707-00551	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 30, 2001 Expiration Date: July 30, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary ambulance refitting and manufacturing source.

Authorized Individual:	Donald Draxler
Source Address:	64697 U.S. 33, Goshen, Indiana 45622
Mailing Address:	P.O. Box 821, Goshen, Indiana 46527
Phone Number:	920 - 233 - 9592
SIC Code:	7532
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

Plant 2

(a) Cleaning operations, known as P06, capacity: 1,022 pounds of thinner per month and 336 pounds of mineral spirits per month.

Plants 2, 3, 5, and 7

(b) Gluing operations, known as P01, exhausted through Stacks S01 - S04, capacity: 14,877 pounds of glue per month.

Plant 6

(c) Welding operations, known as P04, consisting of one (1) stick welding station, capacity: 500 pounds of electrode per month and one (1) oxyacetylene flame-cutting operation.

Plant 7

(d) Painting operations, known as P02, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack S05, capacity: 883 pounds of paint per month and 927 pounds of primer per month.

(e) Woodworking operations, known as P03, consisting of six (6) 10-inch table saws, five (5) 14-inch band saws, two (2) 6-inch belt sanders and three (3) 9-inch chop saws, capacity: 300 pounds of plywood per hour.

Combustion, known as P05, consisting of:

Plant 1

(f) Two (2) natural gas-fired Reznor Furnace, known as 1 and 2, rated at 0.170 million British thermal units per hour, each.

(g) One (1) natural gas-fired Dayton Furnace, rated at 0.200 million British thermal units per hour.

(h) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.

(i) One (1) natural gas-fired office furnace, rated at 0.125 million British thermal units per hour.

Plant 2

(j) Four (4) natural gas-fired overhead heaters, known as 1 - 4, rated at 0.100 million British thermal units per hour, each.

(k) One (1) electric water heater.

Plant 3

(l) Five (5) natural gas-fired overhead heaters, known as 1 - 5, rated at 0.120 million British thermal units per hour, each.

(m) One (1) electric water heater.

Plant 4

(n) Two (2) natural gas-fired overhead heaters, known as 1 and 2, rated at 0.200 million British thermal units per hour, each.

(o) Two (2) electric overhead heaters, known as 3 and 4.

(p) One (1) natural gas-fired water heater, rated at 0.036 million British thermal units per hour.

Plant 5

(q) One (1) natural gas-fired water utility furnace, rated at 0.132 million British thermal units per hour.

(r) One (1) natural gas-fired water heater, rated at 0.032 million British thermal units per hour.

Plant 6

(s) One (1) electric Lennox.

(t) One (1) electric York.

(u) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.

(v) One (1) natural gas-fired Roberts-Gordon, rated at 0.800 million British thermal units per hour.

Plant 7

(w) Five (5) natural gas-fired overhead heaters, known as 1 through 5, rated at 0.120 million British thermal units per hour, each.

(x) One (1) natural gas-fired air make-up unit, rated at 3.520 million British thermal units per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Minor Source Operating Permit [326 IAC 2-6.1]

(a) This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1.

(b) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(c) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in this permit. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all criteria pollutants is less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to two hundred fifty (250) tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-7]

Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.9 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.10 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.11 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two (2) weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 Annual Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.18 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Cleaning, Gluing & Surface Coating

Plant 2

(a) Cleaning operations, known as P06, capacity: 1,022 pounds of thinner per month and 336 pounds of mineral spirits per month.

Plants 2, 3, 5, and 7

(b) Gluing operations, known as P01, exhausted through Stacks S01 - S04, capacity: 14,877 pounds of glue per month.

Plant 7

(d) Painting operations, known as P02, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks S05, capacity:883 pounds of paint per month and 927 pounds of primer per month.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets as well as solid wood, wood composition or simulate wood materials, including plywood shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the painting operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Part 70 Applicability [326 IAC 2-7]

Any change or modification which may increase potential to emit of the entire source to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants, or one hundred (100) tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

D.1.4 New facilities: general reduction requirements [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the gluing or the painting operations to twenty-five (25) tons per year or more, shall require approval from IDEM, OAQ prior to making the change and shall be subject to the requirements of 326 IAC 8-1-6.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emission units and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11]

There are no compliance determination requirements applicable to these emission units.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the painting processes are in operation.

D.1.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating Stack S05 while the painting processes are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Welding and Woodworking Operations

Plant 6

(c) Welding operations, known as P04, consisting of one (1) stick welding station, capacity: 500 pounds of electrode per month and one (1) oxyacetylene flame-cutting operation.

Plant 7

(e) Woodworking operations, known as P03, consisting of six (6) 10-inch table saws, five (5) 14-inch band saws, two (2) 6-inch belt sanders and three (3) 9-inch chop saws, capacity: 300 pounds of plywood per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3-2, the PM from the welding operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Part 70 Applicability [326 IAC 2-7]

Any change or modification which may increase potential to emit of the entire source to one hundred (100) tons per year of PM_{10} from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Combustion, known as P05, consisting of:

Plant 1

(f) Two (2) natural gas-fired Reznor Furnace, known as 1 and 2, rated at 0.170 million British thermal units per hour, each.

(g) One (1) natural gas-fired Dayton Furnace, rated at 0.200 million British thermal units per hour.

(h) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.

(i) One (1) natural gas-fired office furnace, rated at 0.125 million British thermal units per hour.

Plant 2

(j) Four (4) natural gas-fired overhead heaters, known as 1 - 4, rated at 0.100 million British thermal units per hour, each.

(k) One (1) electric water heater.

Plant 3

(l) Five (5) natural gas-fired overhead heaters, known as 1 - 5, rated at 0.120 million British thermal units per hour, each.

(m) One (1) electric water heater.

Plant 4

(n) Two (2) natural gas-fired overhead heaters, known as 1 and 2, rated at 0.200 million British thermal units per hour, each.

(o) Two (2) electric overhead heaters, known as 3 and 4.

(p) One (1) natural gas-fired water heater, rated at 0.036 million British thermal units per hour.

Plant 5

(q) One (1) natural gas-fired water utility furnace, rated at 0.132 million British thermal units per hour.

(r) One (1) natural gas-fired water heater, rated at 0.032 million British thermal units per hour.

Plant 6

(s) One (1) electric Lennox.

(t) One (1) electric York.

(u) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.

(v) One (1) natural gas-fired Roberts-Gordon, rated at 0.800 million British thermal units per hour.

Plant 7

(w) Five (5) natural gas-fired overhead heaters, known as 1 through 5, rated at 0.120 million British thermal units per hour, each.

(x) One (1) natural gas-fired air make-up unit, rated at 3.520 million British thermal units per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

There are no conditions applicable to the equipment in Section D.3

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. :_____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*** Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Medtec Ambulance Corporation**
Address:	**64697 U.S. 33**
City:	**Goshen, Indiana 45622**
Phone #:	**920 - 233 - 9592**
MSOP #:	**039-13707-00551**

I hereby certify that Medtec Ambulance Corporation is **9** still in operation.
9 no longer in operation.

I hereby certify that Medtec Ambulance Corporation is:
9 in compliance with the requirements of MSOP **039-13707-00551**.
9 not in compliance with the requirements of MSOP **039-13707-00551**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for **a Minor Source Operating Permit**

Source Background and Description

Source Name:	**Medtec Ambulance Corporation**
Source Location:	**64697 U.S. 33, Goshen Indiana 45622**
County:	**Elkhart**
SIC Code:	**7532**
Operation Permit No.:	**MSOP 039-13707-00551**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Quality (OAQ) has reviewed an application from Medtec Ambulance Corporation relating to the operation of ambulance refitting and manufacturing source.

History

Medtec was a family owned business purchased by Oshkosh Truck Corporation (OTC) and is now a wholly owned subsidiary of OTC. Medtec Ambulance Corporation claims that the source qualifies for a Permit by Rule pursuant to 326 IAC 2-10, but has elected to apply for an MSOP.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

Plant 2

(a) Cleaning operations, known as P06, capacity: 1.40 pounds of thinner per hour and 0.46 pounds of mineral spirits per hour or 0.15 vehicles per hour.

Plants 2, 3, 5, and 7

(b) Gluing operations, known as P01, exhausted through Stacks S01 - S04, capacity: 20.38 pounds of glue per hour or 0.15 vehicles per hour.

Plant 6

(c) Welding operations, known as P04, consisting of one (1) stick welding station, capacity: one (1) electrode per hour and one (1) oxyacetylene flame-cutting at ½ inch thick or 0.15 vehicles per hour.

Plant 7

(d) Painting operations, known as P02, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack S05, capacity: 1.21 pounds of paint per hour and 1.27 pounds of primer per hour or 0.15 vehicles per hour.

(e) Woodworking operations, known as P03, consisting of six (6) 10-inch table saws, five (5) 14-inch band saws, two (2) 6-inch belt sanders and three (3) 9-inch chop saws, capacity: 300 pounds of plywood per hour or 0.15 vehicles per hour.

Combustion, known as P05, consisting of:

Plant 1

(f) Two (2) natural gas-fired Reznor Furnace, known as 1 and 2, rated at 0.170 million British thermal units per hour, each.

(g) One (1) natural gas-fired Dayton Furnace, rated at 0.200 million British thermal units per hour.

(h) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.

(i) One (1) natural gas-fired office furnace, rated at 0.125 million British thermal units per hour.

Plant 2

(j) Four (4) natural gas-fired overhead heaters, known as 1 - 4, rated at 0.100 million British thermal units per hour, each.

(k) One (1) electric water heater.

Plant 3

(l) Five (5) natural gas-fired overhead heaters, known as 1 - 5, rated at 0.120 million British thermal units per hour, each.

(m) One (1) electric water heater.

Plant 4

(n) Two (2) natural gas-fired overhead heaters, known as 1 and 2, rated at 0.200 million British thermal units per hour, each.

(o) Two (2) electric overhead heaters, known as 3 and 4.

(p) One (1) natural gas-fired water heater, rated at 0.036 million British thermal units per hour.

Plant 5

(q) One (1) natural gas-fired water utility furnace, rated at 0.132 million British thermal units per hour.

(r) One (1) natural gas-fired water heater, rated at 0.032 million British thermal units per hour.

Plant 6

(s) One (1) electric Lennox.

(t) One (1) electric York.

(u) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.

(v) One (1) natural gas-fired Roberts-Gordon, rated at 0.800 million British thermal units per hour.

Plant 7

(w) Five (5) natural gas-fired overhead heaters, known as 1 through 5, rated at 0.120 million British thermal units per hour, each.

(x) One (1) natural gas-fired air make-up unit, rated at 3.520 million British thermal units per hour.

New Emission Units and Pollution Control Equipment

There are no new facilities proposed at this source during this review process.

Existing Approvals

The source has no previous approvals.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S01	Gluing Operations	14	3.99	10,000	70
S02	Gluing Operations	14	3.99	10,000	70
S03	Gluing Operations	10	2.82	10,000	70
S04	Gluing Operations	10	2.82	10,000	70
S05	Painting Operations	2	3.38	8,000	70

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 12, 2001, with additional information received on February 22 as well as March 13 and 30, 2001.

Emission Calculations

See pages 1 through 6 of 6 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	**Potential To Emit** (tons/year)
PM	6.01
PM_{10}	6.18
SO_2	0.019
VOC	66.1
CO	2.61
NO_X	3.11

HAPs	**Potential To Emit** (tons/year)
Xylene	0.320
Ethylbenzene	0.010
Methanol	2.29
MEK	0.117
Naphthalene	0.317
Styrene	0.250
Toluene	6.98
MIBK	0.530

Benzene	0.00007
Dichlorobenzene	0.00004
Formaldehyde	0.002
Hexane	0.056
Lead Compounds	0.00002
Cadmium Compounds	0.00003
Chromium Compounds	0.00004
Manganese Compounds	0.00002
Nickel Compounds	0.00007
TOTAL	10.9

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

(b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Surface Coating	0.017	0.017	0.000	66.0	0.000	0.000	10.8
Woodworking	3.52	3.52	0.000	0.000	0.000	0.000	0.000
Combustion	0.059	0.237	0.019	0.171	2.61	3.11	0.059
Welding & Cutting	0.714	0.714	0.000	0.000	0.000	0.000	negligible
Total Emissions	4.31	4.49	0.019	66.2	2.61	3.11	10.9

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	36.0
PM_{10}	36.2
SO_2	0.019
VOC	66.2
CO	2.61
NO_X	3.11
Single HAP	6.98
Combination HAPs	10.9

This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) any combination of HAPS is less than twenty-five (25) tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T since the source does not use halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New facilities: general reduction requirements)

This rule may apply to new facilities as of January 1, 1980. Since the potential VOC emissions from the following operations: painting, vinyl and foam seat and bench gluing, carpet and mat application and gluing, cabinet installation, and formica and plywood bonding are each less than twenty-five (25) tons per year, 326 IAC 8-1-6 does not apply to each of these operations. Any change or modification which would increase the potential to emit VOC to twenty-five (25) tons per year or more for any of these operations, shall obtain prior approval from IDEM, OAM.

326 IAC 8-6 (Organic solvent emission limitations)

Although some of the facilities were constructed prior to January 1, 1980, the potential to emit VOC from the entire source is less than one hundred (100) tons per year. Therefore, the requirements of this rule are not applicable to the source.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9(b)(4), sources which perform customized top coating of automobiles and trucks at a rate of less than thirty-five (35) vehicle per day are not subject to the requirements of this rule. Medtec has stated that their painting operation qualifies as a top coating operation of less than thirty-five (35) vehicles per day and thus the painting operations are not subject to the requirements of 326 IAC 8-2-9..

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

The surface coating operations are subject to the requirements of 326 IAC 8-2-12 since the coatings are being applied to solid wood, wood composition or simulated wood materials, including plywood. Pursuant to 326 IAC 8-2-12, the existing hand-held gun guns used in the gluing operation comply with this rule.

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) from painting operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from woodworking operation shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour (0.150 tons per hour).

The PM emissions from woodworking operation are 0.804 pounds per hour which is less than the allowable PM emission rate of 1.15 pounds per hour. Therefore, this woodworking operation is in compliance with this rule.

Conclusion

The operation of this ambulance refitting and manufacturing source shall be subject to the conditions of the attached proposed Minor Source Operating Permit 039-13707-00551.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	**Medtec Ambulance Corporation**
Source Location:	**64697 U.S. 33, Goshen Indiana 45622**
County:	**Elkhart**
Construction Permit No.:	**MSOP 039-13707-00551**
SIC Code:	**7532**
Permit Reviewer:	**Mark L. Kramer**

On April 20, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Medtec Ambulance Corporation had applied for a operating permit to operate an ambulance refitting and manufacturing source with dry filters as particulate matter control. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 8, 2001, Donald Draxler of Medtec, submitted comments on the proposed construction permit. The summary of the comments and corresponding responses are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comments 1 - 5:

Section A.2. (a), (b), (c), (d), and (e)
The description of the processes in these sections represents the facility operations as having a production capacity of 0.15 vehicles per hour. In our consultant's, RMT, Inc., February 21, 2001, letter to you, we indicated that the painting and solvent usage operations at the facility can not be readily identified on a "parts per hour" basis. While the letter did not specifically request the removal of the 0.15 vehicles per hour limitation in that letter, we do not think that such a production rate correctly reflects the operations at the facility. The operations performed on each vehicle are too variable to allow for the description of process operations on a vehicle-per-hour basis. Accordingly, we are requesting removal of the 0.15 vehicle per hour capacity restriction from the process descriptions in the permit document.

Section A.2.(a)
The cleaning operations are represented as having a maximum capacity of 1.4 pounds of thinner per hour and 0.46 pounds of mineral spirits per hour. While these numbers accurately reflect the information presented on the permit application forms, we believe the capacity of the cleaning operations can be better represented by capacity numbers that use longer term averaging periods.

The throughput on the cleaning operations are dependent on the number and type of vehicles being worked on at the facility and the specific operations being performed on those vehicles. The types of operations being performed are quite variable. Since the capacities recorded in the permit are primarily for the purpose of characterizing the specific operations covered under the proposed permit, we do not think the representation of operations through hourly capacities will provide a reasonable basis to verify the ongoing operations at the facility. As a result, we are requesting that the capacity of the cleaning operations be represented on a monthly or yearly usage rate basis. We are requesting that the current hourly capacities be revised to 1,022 pounds of thinner usage per month or 12,264 pounds of thinner usage per year, and 336 pounds of mineral spirits usage per month or 4,030 pounds of mineral spirits usage per year. Please note that usage for these raw materials is defined as the amount used less the amount disposed as waste.

Section A.2.(b)
The gluing operations are represented as having a maximum capacity of 20.38 pounds of glue per hour. While this capacity accurately reflect the information presented on the permit forms, we believe the capacity of the gluing operation, like that of the cleaning operations, can be better represented by capacity numbers that use longer term averaging periods.

The throughput on the gluing operations are dependent on the number and type of vehicles being worked on at the facility and the specific gluing operations being performed on those vehicles. The types of operations being performed are quite variable. Since the capacities recorded in the permit are primarily for the purpose of characterizing the specific operations covered under the proposed permit, we do not think the representation of operations through hourly capacities will provide a reasonable basis to verify the ongoing operations at the facility. As a result, we are requesting that the current hourly capacity be revised to 14,877 pounds of glue usage per month or 178,529 pounds of glue usage per year. Again, please note that usage for the glues is defined as the amount used less the amount disposed as waste.

Section A.2.(d)
The painting operations are represented as having a maximum capacity of 1.21 pounds of paint per hour and 1.27 pounds of primer per hour. While these numbers accurately reflect the information presented on the permit application forms, we believe the capacity of the painting operations can be better represented by capacity numbers that use longer term averaging periods.

The throughput on the painting operations is dependent on the number and type of vehicles being worked on at the facility and the specific painting operations being performed on those vehicles. The amount of paint applied to a vehicle is quite variable. Since the capacities recorded in the permit are primarily for the purpose of characterizing the specific operations covered under the proposed permit, we do not think the representation of operations through hourly capacities will provide a reasonable basis to verify the ongoing operations at the facility. As a result, we are requesting that the current hourly capacities be revised to 883 pounds of paint sprayed per month or 10,600 pounds of paint sprayed per year, and 927 pounds of primer sprayed per month or 11,125 pounds of primer sprayed per year. Please note that we have included the term “sprayed” in the above painting description to account for the amount of paint or primer disposed as waste.

Section A.2.(e)
The woodworking operations are represented as having a maximum capacity of 300 pounds per hour. We believe the capacity of the woodworking operation, like that of the operations noted above, can be better represented by capacity numbers that use longer term averaging periods. We are requesting that the current hourly capacity be revised to 219,000 pounds per month or 2.6 million pounds per year.

Responses 1 - 5:

The capacities listed in the emission unit descriptions of Condition A.2 and Sections D.1 and D.2 are required to be in the Minor Source Operating Permit in order for IDEM, OAQ to completely assess the source’s potential to emit as well as determine how much the potential to emit of the source has increased in any future modifications to existing permitted equipment. The process specific emissions limitations identified in Section D of the permit are often determined from this information. The capacity stated in the emission units descriptions are not enforceable conditions and are not true emissions limitations. Condition(A.2) for the surface coating operations, Items (a), (b) and (d), does not impose any type of emission limit on the facilities based on hourly throughputs. In addition, there are no State or Federal rules that need to show daily compliance. Therefore, Conditions A.2 (a), (b) and (d) as well as Condition D.1 (a), (b) and (d) have been revised as follows:

Since the process weight rate for the woodworking operations need to be specified on an hourly time frame in order to determine the allowable PM emission rate pursuant to 326 IAC 6-3-2, the longer time frame throughput for woodworking processes can not be accommodated. Therefore Condition A.2(e) has not been revised.

Plant 2

(a) Cleaning operations, known as P06, capacity: **1,022** ~~1.40~~ pounds of thinner per **month** ~~hour~~ and **336** ~~0.46~~ pounds of mineral spirits per **month** ~~hour or 0.15 vehicles per hour~~.

Plants 2, 3, 5, and 7

(b) Gluing operations, known as P01, exhausted through Stacks S01 - S04, capacity: **14,877** ~~20.38~~ pounds of glue per **month** ~~hour or 0.15 vehicles per hour~~.

Plant 7

(d) Painting operations, known as P02, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack S05, capacity: **883** ~~1.21~~ pounds of paint per **month** ~~hour~~ and **927**~~1.27~~ pounds of primer per **month** ~~hour or 0.15 vehicles per hour~~.

(e) Woodworking operations, known as P03, consisting of six (6) 10-inch table saws, five (5) 14-inch band saws, two (2) 6-inch belt sanders and three (3) 9-inch chop saws, capacity: 300 pounds of plywood per hour ~~or 0.15 vehicles per hour~~.

Comment 6:

Section A.2.(c)
The welding operations are represented as having a maximum capacity of one electrode per hour. We believe the capacity of the welding operation, like that of the gluing and cleaning operations, can be better represented by capacity numbers that use longer term averaging periods. In addition, the potential emissions for this process were estimated in the permit application and in the Technical Support Document (TSD) based on an annual electrode usage rate of 5,992 pounds per year. Accordingly, we are requesting that the current hourly capacity be revised to 500 pounds of electrodes per month or 5,992 pounds of electrodes per year.

The oxyacetylene flame cutting operation is represented as cutting metal with a maximum thickness of ½ inch. The emissions from the flame cutting operation were estimated in the permit application and in the TSD based on an hourly emission rate provided by the United States Environmental Protection Agency. This hourly emission rate was not dependent on the thickness of the metal cut. Accordingly, we are requesting that the metal thickness be removed from the description of the oxyacetylene flame cutting operation.

Response 6:

Condition A.2(c) and Section D.2 have had the thickness of the metal cut deleted from the description and the monthly usage rate added as follows since the emissions calculation was not based on thickness explicitly as follows:

Plant 6

(c) Welding operations, known as P04, consisting of one (1) stick welding station, capacity: **500** ~~one (1)~~ **pounds of** electrode per **month** ~~hour~~ and one (1) oxyacetylene flame-cutting **operation** ~~at ½ inch thick or 0.15 vehicles per hour~~.

Upon further review, the OAQ has decided to make the following changes to the construction permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

1. Condition C.20 has been clarified that reports required by Section D of the proposed permit are submitted to the address indicated as follows:

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) The reports required ~~in (a) of this condition and reports required~~ by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Medtec Ambulance Corporation
Address City IN Zip: 64697 U.S. 33, Goshen, Indiana 45622
MSOP: 039-13707
Plt ID: 039-00551
Reviewer: Mark L. Kramer
Date: January 12, 2001

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Cleaning																
Mineral Spirits	6.51	100.00%	0.0%	100.0%	0.0%	0.00%	0.07066	1.00	6.51	6.51	0.46	11.04	2.01	0.00	n/a	100%
Thinner	6.76	100.00%	80.0%	20.0%	0.0%	0.00%	0.20710	1.00	1.35	1.35	0.28	6.72	1.23	0.00	n/a	100%
Gluing																
Red Glue	6.60	81.67%	21.0%	60.7%	0.0%	6.6%	1.58000	1.00	4.00	4.00	6.33	151.84	27.71	0.00	n/a	100%
Clear Glue	5.40	60.00%	0.0%	60.0%	0.0%	0.0%	1.32000	1.00	3.24	3.24	4.28	102.64	18.73	0.00	n/a	100%
Floor Glue	11.80	75.00%	0.0%	75.0%	0.0%	25.0%	0.24000	1.00	8.85	8.85	2.12	50.98	9.30	0.00	n/a	100%
Painting																
FSCM 2851	8.67	82.00%	0.0%	82.0%	0.0%	64.50%	0.13956	1.00	7.11	7.11	0.99	23.81	4.35	0.24	11.02	75%
Primer																
NCP270	12.72	47.26%	0.0%	47.3%	0.0%	73.76%	0.09984	1.00	6.01	6.01	0.60	14.40	2.63	1.47	8.15	50%
								PM	Control Efficiency	99.00%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**		**15.06**	**361.44**	**65.96**	**1.71**		
									Controlled		**15.06**	**361.44**	**65.96**	**0.02**		

METHODOLOGY

Gallons per unit = stated lbs/hr / density of the material (lbs/gal) / unit/hr

Thinner = 1.4 lbs/hr, Mineral Spirits = 0.46 lbs/hr, glue = 20.38 lbs/hr total, paint = 1.21 lbs/hr primer =1.27 lbs/hr

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Medtec Ambulance Corporation
Address City IN Zip: 64697 U.S. 33, Goshen, Indiana 45622
MSOP: 039-13707
Plt ID: 039-00551
Reviewer: Mark L. Kramer
Date: January 12, 2001

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %	Weight %	Weight %	Weight %	Weight %	Weight % Toluene	Weight %	Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)	Toluene Emissions (tons/yr)	Emissions (tons/yr)
Cleaning																	
Mineral Spirits	6.51	0.07066	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Thinner	6.76	0.20710	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gluing																	
Red Glue	6.60	1.58000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00	0.00	0.00	0.00	0.00	6.85	0.00
Clear Glue	5.40	1.32000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Floor Glue	11.80	0.24000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Painting																	
FSCM 2851	8.67	0.13956	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Primer																	
NCP270	12.72	0.09984	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
										Individual Total	**0.00**	**0.00**	**0.00**	**0.000**	**0.00**	**6.85**	**0.000**

METHODOLOGY

Plus HAPs From Other Coatings (not worst case VOC)

Xylene	**Ethyl Benzene**	**Methanol**	**MEK**	**Naphthalene**	**Styrene**	**Toluene**	**MIBK**
(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
0.320	**0.010**	**2.290**	**0.117**	**0.317**	**0.250**	**0.130**	**0.530**

Overall Total **10.8**

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Medtec Ambulance Corporation
Address City IN Zip: 64697 U.S. 33, Goshen, Indiana 45622
MSOP: 039-13707
Plt ID: 039-00551
Reviewer: Mark L. Kramer
Date: January 12 ,2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.253	62.25

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.059	0.237	0.019	3.11	0.171	2.61

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Heat Content of Natural Gas = 1,020.7 btu/ccf

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu* 1000/Heat Content of Natural Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Medtec Ambulance Corporation
Address City IN Zip: 64697 U.S. 33, Goshen, Indiana 45622
Part 70: 039-13707
Plt ID: 039-00551
Reviewer: Mark L. Kramer
Date: January 12 ,2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.536E-05	3.735E-05	2.334E-03	5.602E-02	1.058E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.556E-05	3.424E-05	4.357E-05	1.183E-05	6.536E-05	0.059

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Company Name: **Medtec Ambulance Corporation**
Address City IN Zip: **64697 U.S. 33, Goshen, Indiana 45622**
MSOP: **039-13707**
Plt ID: **039-00551**
Company Name: **Medtec Ambulance Corporation**
Address City IN Zip: **64697 U.S. 33, Goshen, Indiana 45622**

Assumptions:
The cut sheets provide sizes of all pieces. To be conservative, it was assumed that the entire perimeter of the piece was cut.
The saw blade thickness is 1/8 inch
The total sawdust generated is the cut length times the cut thickness times the cut dept.
The density of wood was assumed to be 42 pounds per cubic foot (pine)
10% of the sawdust is PM (90% settling rate >100 um)

		Cut Lengths			
Actual 2000 hr/yr	Board Depth Inches	Inches	Feet	Feet Per 300 Trucks	Sawdust Generated Cubic Feet
Cabinets - Plant #1	0.75000	5439.95	453.3292	135998.75	88.54085
Cabinets - Plant #1	0.50000	5522.58	460.215	138064.5	59.92383
Ceiling Panels - Plant #3	0.12500	1030.00	85.83333	25750	2.794054
Cabinets - Plant #3	0.25000	1772.00	147.6667	44300	9.613715
Cabinets - Plant #3	0.50000	780.75	65.0625	19518.75	8.47168
Cabinets - Plant #3	0.75000	1349.75	112.4792	33743.75	21.96859
Door Panels - Plant #2 (x50)	0.09375	466.50	38.875	1943.75	0.158183
Note: Plant #2 Feet/50 Trucks				**Total**	191.4709

Potential PM Emission (based on double the actual capacity)

Therefore potential sawdust generated equals 2 x actual x 8760/2000 1677.285 cubic feet

PM = 10% of the sawdust generated (cubic feet) * 42 lbs/cubic feet)/2000 lbs/ton

PM = **3.52** tons per year

Welding and Torch Cutting Emissions

Company Name: **Medtec Ambulance Corporation**
Address City IN Zip: **64697 U.S. 33, Goshen, Indiana 45622**
MSOP: **039-13707**
Plt ID: **039-00551**
Company Name: **Medtec Ambulance Corporation**
Address City IN Zip: **64697 U.S. 33, Goshen, Indiana 45622**

OxyAcetylene Torch Cutting Emissions

Applicant Claims Worst Case Fume Generation (PM and PM-10) is 0.81 grams of PM per minute

Therefore, Potential to Emit PM and PM-10 = 0.81 grams/min x 60 min/hr x 8,760 hrs/yr x 1 lb/453.6 gm x 1 ton/2000 lb

PM & PM-10 = 0.469 tons/yr

Welding PM and PM-10 Emissions

	Unit Size	Usage	Based on 2000 hr Actual	Hourly Usage	Double Hourly Usage	Potential 8760 Hours	
Aluminum Spools (lbs)	1	3	3	0.002	0.003	26.28	
Aluminum Spools (lbs)	16	6	96	0.048	0.096	840.96	
Steel Spools (lbs)	45	12	540	0.270	0.54	4730.4	
TIG Rods (lbs)	10	4	40	0.020	0.04	350.4	
Solder (lbs)	1	5	5	0.003	0.005	43.8	
					Total	**5991.84**	Lbs

AP-42 Emission Factor 81.6 lbs of PM/1000 lbs/material

PM & PM10 = 81.6/1000 lbs x 5991.84 lbs = 488.9341 lbs/year
0.244 **tons/year**

Cutting & Welding Total PM and PM-10 0.714 tons/year